

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

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DR. ROBERT LEDERER,
Plaintiff,

v.

JOHN SNOW, INC. and
THE JOHN HOPKINS UNIVERSITY/
CENTER FOR COMMUNICATION
PROGRAM,
Defendants.

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CIVIL ACTION NO.
04-10284-NG

JOINT STATEMENT PURSUANT TO LOCAL RULE 16.1(D)

A. STATUS OF THE CASE

The parties are presently still engaged in formal discovery. All written discovery is complete. As a result of a miscommunication between Counsel, the second half of Plaintiff's Deposition was not completed. The defendant, Johns Hopkins University, has renewed its motion to dismiss. Furthermore, 30(b)(6) Depositions of both Defendants have not been completed. Dates are currently being exchanged between the parties.

B. REMAINING PRETRIAL SCHEDULING

The parties request that the deadline for discovery in this case be extended through April 15, 2005, as counsel for the defendant, John Snow, Inc., has a scheduled vacation the week of March 22 through 28, 2005. The parties request that the deadline for dispositive motions be extended to April 30, 2005.

C. ALTERNATIVE DISPUTE RESOLUTION

The parties do not feel ADR is an option in this case.

D. TRIAL

The parties consent to try this matter before Magistrate Judge Judith Gail Dein.

**The Plaintiff,
By his attorney**

/s/ David B. Stein

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**Johns Hopkins University/
Center for Communication Programs,
By their attorney,**

/s/ John F. Rooney, III

John F. Rooney, III, BBO# 426895
Robert W. Healy, BBO# 630714
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**John Snow, Inc.
By their attorney,**

/s/ Andrew F. Caplan

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Dated: March 9, 2005